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February 3, 2020

Via ECF

Hon. Cheryl L. Pollak
United States District Court Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza E.
Brooklyn, NY 11201

**Re: Motion to adjourn status conference and stay
discovery**

CASE NAME: SHEEHAN V. CONSENSYS, INC.

Case No. 19-cv-04154 (DLI)(CLP)

Dear Judge Pollak,

I represent the Plaintiff in the above referenced matter. I am writing the Court to request an adjournment of tomorrow's status conference at 10:00 am and a ninety day stay of discovery. I have conferred with opposing counsel who does not oppose the request.

Currently, there are no known discovery disputes that require Court intervention. To date, the Parties have endeavored to complete written discovery. Both sides have exchanged and responded to written demands. I am awaiting final ESI from the Defendants, and the Defendants are awaiting medical records from the Plaintiff's providers. Admittedly, both sides have had some challenges securing records from certain health care providers.

However, yesterday my client contacted me and informed me that he had to undergo a 60-90 day substance abuse detox program. Without disclosing privileged information, I can represent to the Court that this treatment is medically necessary and very serious. While in treatment, I may have little to no contact with my client and depositions would be an impossibility. The length of the treatment is dependent on his ability to pay for the treatment programs, but 60-90 days is anticipated.

For this reason, I am requesting a stay of discovery. If my client returns earlier, I will apprise the Court and opposing counsel immediately to update the discovery schedule and finalize the litigation. In the meantime, the Parties will continue to finalize written discovery.

I know this is a last-minute request, but I only learned of this information late last night and spoke with opposing counsel this afternoon. Thank you for your time and attention to this matter, and I apologize for the inconvenience.

Respectfully Submitted,

By: 

Jordan El-Hag, Esq.